Honorable James L. Robart 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE DILLON, No. 2:18-cy-01442-JLR 11 Plaintiffs, JOINT STATUS REPORT AND 12 (PROPOSED) ORDER 13 Noted on Motion Calendar U.S. DEPARTMENT OF HEALTH AND **January 9, 2020** 14 **HUMAN SERVICES, ADMINISTRATION** FOR CHILDREN AND FAMILIES, and 15 OFFICE OF REFUGEE RESETTLEMENT, 16 Defendants. 17 18 Plaintiffs THE HUMAN RIGHTS DEFENSE CENTER ("HRDC") and 19 MICHELLE DILLON (collectively, "Plaintiffs") and Defendants U.S. DEPARTMENT OF 20 HEALTH AND HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND 21 FAMILIES and OFFICE OF REFUGEE RESETTLEMENT (collectively, "Defendants") 22 hereby provide the Court with a Joint Status Report pursuant to the Court's October 15, 23 2019 Order (Dkt. No. 42). 24 Since the last Joint Status Report, filed on October 9, 2019, the Defendants have 25 made one interim production of claim and complaint records responsive to Plaintiffs' 26 Freedom of Information Act requests. Although in October of 2019 Defendants indicated

JOINT STATUS REPORT AND [PROPOSED] ORDER No. 2:18-cv-01442-JLR – Page 1 Arête | 1218 THIRD AVENUE | SUITE 2100 | SEATTLE WA 98101 | (206) 428-3250

1 that they anticipated producing all such responsive records by early January of 2020, that 2 production has not yet been completed. Defendants anticipate production to be complete 3 within the next several days. 4 Plaintiffs are evaluating the spreadsheet summaries of Serious Incident Reports. 5 Plaintiffs are also awaiting the final production of claim and complaint records. 6 In light of Defendants' representation that all Serious Incident Report spreadsheet 7 summaries have been produced and that all responsive claim and complaint documents will 8 be produced within the next several days, and in light of the Plaintiffs' ongoing evaluation 9 of the documents produced to date and anticipated evaluation of the documents to be 10 produced, the parties propose that a joint status report be filed approximately six weeks 11 from today, on or before February 24, 2020. 12 Dated: January 9, 2020 Respectfully submitted, 13 ARETE LAW GROUP PLLC 14 By: /s/ Jeremy E. Roller 15 Jeremy E. Roller, WSBA No. 32021 1218 Third Avenue, Suite 2100 16 Seattle, WA 98101 Telephone (206) 428-3250 17 Fax (206) 428-3251 jroller@aretelaw.com 18 19 HUMAN RIGHTS DEFENSE CENTER 20 By: /s/ Masimba Mutamba · 21 Masimba M. Mutamba, pro hac vice William A. Trine Law Fellow & Staff Attorney 22 P.O. Box 1151 Lake Worth, FL 33460 23 Telephone (561) 360-2523 Fax (866) 735-7136 24 mmutamba@humanrightsdefensecenter.org 25 Attorneys for Plaintiffs The Human Rights Defense Center and Michelle Dillon 26

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1	BRIAN T. MORAN United States Attorney
2	
3	By: <u>/s/ Michelle R. Lambert</u> Michelle R. Lambert, NYS # 4666657 Assistant United States Attorney
4	United States Attorney's Office 700 Stewart Street, Suite 5220
5	Seattle, WA 98101
6	Telephone (206) 553-7970 Fax (206) 553-4073 michelle.lambert@usdoj.gov
7	
8	Attorneys for Defendants
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1	PROPOSED ORDER
2	It is hereby ORDERED that:
3	The parties shall submit a joint status report to the Court on or before February 24,
4	2020.
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6	Dated this 10 day of January, 2020
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8	(,)
9	Honorable James L. Robart
10	United States District Court Judge
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2	CERTIFICATE OF SERVICE	
3	I hereby certify that on this date, I electronically filed the foregoing document with	
4	the Clerk of the Court using the CM/ECF system, which will send notification of such filing	
5	to the following:	
6	MICHELLE R. LAMBERT, NYS #4666657 Assistant United States Attorney	
7	United States Attorney's Office 700 Stewart Street, Suite 5220	
8	Seattle, Washington 98101 Phone: (206) 553-7970	
9	Fax: (206) 553-4073	
10	Email: michelle.lambert@usdoj.gov	
11	Attorneys for Defendants	
12		
13	DATED: January 9, 2020, at Seattle, Washington.	
14	s/ Annabel Barnes	
15	Annabel Barnes, Legal Assistant	İ
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